

EXHIBIT 13

To the Mao Declaration ISO
Plaintiffs' Administrative
Motion re: Google's Production
of Documents Improperly
Withheld as Privileged

REDACTED VERSION OF
DOCUMENT

Message

From: Balaji Ramachandran [ramachandan@google.com]
Sent: 7/30/2021 9:41:20 PM
To: Moe Tabar [tabar@google.com]
CC: Bryan Horling [bhorling@google.com]; Dale Nil [dneal@google.com]; Breanne Duncan [brduncan@google.com]; Noah Swartz [swartzcr@google.com]; Shawn Lyndon [slyndo@google.com]; Christina Collada [cmcollada@google.com]; David Gasca [gasca@google.com]; Erik Boxhoorn [boxhoorn@google.com]; Amna Latif [amnalatif@google.com]; James Wang [jamesywang@google.com]; Diana Valverde-Paniagua [drvp@google.com]; Lilly Won [lillyw@google.com]; JK Kearns [jkearns@google.com]; Amit Chibber [amitabh@google.com]; Kevin Berlin [kberlin@google.com]; Sammit Adhya [sadhya@google.com]; Michal Brzozowski [mbrz@google.com]; Oladapo Okupe [olao@google.com]
Subject: Re: xGA incognito logging

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Regards,
Balaji

On Tue, Jul 27, 2021 at 8:05 PM Moe Tabar <tabar@google.com> wrote:
We already evaluated it (for 7 days though) over [REDACTED] logs and I already shared the doc with you where you can see more numbers there.

On Tue, Jul 27, 2021 at 4:25 PM Bryan Horling <bhorling@google.com> wrote:

On Tue, Jul 27, 2021 at 6:38 PM Dale Nil <dneal@google.com> wrote:
Privileged

On Thu, Jul 22, 2021 at 3:03 PM Breanne Duncan <brduncan@google.com> wrote:
CONFIDENTIAL AND PRIVILEGED

Redacted - Privilege

Redacted - Privilege

On Wed, Jul 21, 2021 at 7:39 PM Bryan Horling <bhorling@google.com> wrote:

On Wed, Jul 21, 2021 at 12:46 PM Noah Swartz <swartzcr@google.com> wrote:

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On Wed, Jul 21, 2021 at 8:56 AM Shawn Lyndon <slyndo@google.com> wrote:
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Amit for legal guidance.

Thanks Christina and welcome back.

Comments in line below.

On Tue, Jul 20, 2021, 7:47 PM Christina Collada <cmcollada@google.com> wrote:
+Shawn Lyndon +Lilly Won +Breanne Duncan +JK Kearns +Amit Chibber +Moe
Tabar (please add others from Royal Court team as needed)

Attorney Client Privilege, Amit please advise

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On Tue, Jul 20, 2021 at 5:51 PM Diana Valverde-Paniagua <drvp@google.com> wrote:

* The PDD mentions a that [REDACTED] - is there a draft of this policy yet?

I believe this is it: [go/sp-policy-incognito](https://go.sp-policy-incognito)

Correct

* Is access restriction to xGA incognito team already in place - or is that a planned addition? We don't have any restrictions based on an mdb group so far, but I believe this would be part of the plan.

Need more details to confirm. What access restrictions are required for xGA product team? Access to logs data pre-coarsening?

** Will this access restriction also be enforced for all downstream consumers? I'm not sure. I would assume so, but this is more under the purview of [REDACTED] (we're just providing the information for [REDACTED]).

See prior note. It is not clear to me what access restriction we are referring to here?

* To Diana - How would people join incognito and non-incognito sessions (through experiment IDs?), and how does [REDACTED] plan to prevent this? There are some device-tier experiment IDs which remain constant in signed-in, signed-out and incognito sessions. Someone with logs access could theoretically join signed-in logs to the user's incognito logs based on the device-tier IDs with the right query. I'm not sure how [REDACTED] plans to prevent it, but I would guess that the most important part would be restricting access to the experiment ID field, and then monitoring the queries that access the field.

FWIW, [REDACTED] it was chosen as the alternative to a client-side solution of minimizing all join risks [REDACTED]
Which wouldn't be as scalable or comprehensive across iGA and aGA, at least immediately, for all of the numerous join vectors (as we were designing client-specific solutions for one join risk, more kept coming up).

Join risk is out of scope for the currently approved solution. Please confirm if we need to revisit these requirements for the MVP solution.

On Tue, Jul 20, 2021 at 3:59 PM Noah Swartz <swartzcr@google.com> wrote:

A few things:

- * Can you explain the technical process for 'de-identifying' IP address in the PDD? Is the plan to truncate IP? If so, by how much?
- * The PDD mentions [REDACTED] - is there a draft of this policy yet?
- * Is access restriction to xGA incognito team already in place - or is that a planned addition?
- ** Will this access restriction also be enforced for all downstream consumers?
- * To Diana - How would people join incognito and non-incognito sessions (through experiment IDs?), and how does [REDACTED] plan to prevent this?

Overall what is in the PDD does not seem that contentious (adding an `is_incognito` flag, counting DAU, etc) but I am eager to know when and what further policy restrictions we will put in place for these logs.

[@Christina Collada](#) happy to have a quick chat to clear up any final questions if that's easier

On Tue, Jul 20, 2021 at 8:34 AM Balaji Ramachandran <ramachandan@google.com> wrote:

Hi Noah - Is there anything we can help to gather the details Kevin requested from you. let us know. We are currently blocked and appreciate any help to move this forward and gather approval ASAP !!

On Thu, Jul 15, 2021 at 8:23 PM Kevin Berlin <kberlin@google.com> wrote:

Thanks all! Noah, can you give what's assembled here a final review given your previous pre-review of this change?

-Kevin

On Thu, Jul 15, 2021, 4:16 PM Christina Collada <cmcollada@google.com> wrote:

[+Noah Swartz](#) [+Kevin Berlin](#) [+Sammit Adhya](#)

We've pre-reviewed this proposal with [@Noah Swartz](#) and PDPO in pretty thorough depth earlier this year. The various eng teams can't continue working on this until we have PWG approval, and it's been over a month since we submitted PDD updates and everything else for the privacy review.

What else can we do to facilitate it's approval? Would it help to have another discussion?

On Wed, Jul 14, 2021 at 9:35 PM Diana Valverde-Paniagua <drvp@google.com> wrote:

Re: the inclusion of experiment IDs + Zwieback, what [REDACTED] would be providing would be monitoring how often/who accesses that information.

The motivation for the client continuing to send the Zwieback + experiment IDs would be [REDACTED]

However, the plan is that [REDACTED]

[REDACTED]. As Michal mentioned, the is_incognito bit is a necessary part of being able to apply a policy to [REDACTED] logs via [REDACTED].

On Tue, Jul 13, 2021 at 1:25 AM Michal Brzozowski <mbrz@google.com> wrote:

Re is_incognito: [REDACTED]. Not only [REDACTED] but also searches etc. The way we plan to achieve is by [REDACTED]

On Tue, 13 Jul 2021 at 00:40, Christina Collada <cmcollada@google.com> wrote:

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Removing [REDACTED] already makes these logs stand out as Incognito to anyone with basic Search Logs access. That's why we want to stop doing this. We also need to understand the impact of Incognito feature LEs in order to continue investing in Private Search.

Zwieback ID is already in iGA Incognito events.

On Mon, Jul 12, 2021 at 6:00 PM Oladapo Okupe <olao@google.com> wrote:

Hi all:

Still need some clarification on parts of this launch. The [REDACTED] portion to collect metrics makes sense to me.

Wrt to the other pieces, here's how I understand it currently:

The is_incognito flag will be added to [REDACTED] logs. This flag signals [REDACTED]

[REDACTED] Do I have this understanding correct?

Follow-up question: If we're going through the process of using [REDACTED] to de-identify logs, wouldn't adding experiment ID and Zwieback ID defeat the purpose of this?

Thanks

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Regards,
Ola

Oladapo (Ola) Okupe	Audit Manager - Privacy &
Security	olao@google.com 650-203-1154

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Christina Collada | Google App Product Team

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Christina Collada | Google App Product Team

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Christina Collada | Google App Product Team

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Moe Tabar | Senior Software Engineer | tabar@google.com | 310-460-4094